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**Subject:** leaf

The EQB beneficial use determination is based on Agremax not exceeding the RCRA toxicity characteristic for heavy metals, as detailed in a 2007 study and report by the Puerto Rico legislature which concluded that Agremax was non-toxic and thus appropriate for beneficial reuse. However, it should be noted that that concerns were raised by the EPA Science Advisory Board SAB on the overly broad use of the TCLP in evaluating CCRs for beneficial use applications, and that the LEAF test methods are currently undergoing inter-laboratory validation to facilitate more routine use in environmental decision making. While these methods have not yet been published in the EPA SW-846 Test Methods for Evaluating Solid Wastes, they are already in use by several laboratories, including those involved in the inter-laboratory comparison.